

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**Timber Wolf Trailers
13861 County Road 4
Bristol, Indiana 46507**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-12493-00289	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates source that manufacturers utility trailers.

Authorized Individual: Jim Bishop
Source Address: 13861 County Road 4, Bristol, IN 46507
Mailing Address: P.O. Box 698, White Pigeon, MI 49099
Phone Number: (616) 483-7681
SIC Code: 3799
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Area Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) A plywood department consisting of the following:
 - (1) One (1) table saw, one (1) pin router, and one (1) band saw with particulate matter controlled by one (1) cyclone and one (1) baghouse (consisting of one (1) filter bag and identified as C1); and
 - (2) One (1) table saw with particulate matter controlled by one (1) baghouse (consisting of one (1) filter bag and identified as C2).
- (b) A painting department consisting of two (2) spray paint booths equipped with air-assisted and airless spray guns for painting steel trailer frames with primer and paint. The facility can apply undercoat at a maximum rate of 1 trailer per hour and apply paint at a maximum rate of 0.4 trailers per hour. Overspray is controlled using dry filters.
- (c) One welding department consisting of six (6) metal inert gas (MIG) welding stations.
- (d) Roofing and finishing departments using cleaners, sealants, and adhesives.
- (e) Sixteen (16) 0.08 MMBtu per hour radiant tube heaters fired by natural gas.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.18 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) A plywood department consisting of the following:
- (1) One (1) table saw, one (1) pin router, and one (1) band saw with particulate matter controlled by one (1) cyclone and one (1) baghouse (consisting of one (1) filter bag and identified as C1); and
 - (2) One (1) table saw with particulate matter controlled by one (1) baghouse (consisting of one (1) filter bag and identified as C2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 1.27 pounds per hour when operating at a process weight rate of 347 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.3 Particulate Matter (PM)

The cyclone baghouse identified as C1, and the baghouse identified as C2 for PM control shall be in operation at all times when the table saws, pin routers, and band saw are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

If the baghouse exhausts are at any time directed outdoors, the Permittee shall perform the following compliance monitoring requirements:

- (a) Daily visible emission notations of the baghouse exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.6 Failure Detection

In the event that bag failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Malfunction Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts and the dates the vents are redirected.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) A painting department consisting of two (2) spray paint booths equipped with air-assisted and airless spray guns for painting steel trailer frames with primer and paint. The facility can apply undercoat at a maximum rate of 1 trailer per hour and apply paint at a maximum rate of 0.4 trailers per hour. Overspray is controlled using dry filters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.1 Volatile Organic Compounds (VOC)

- (a) The painting department has actual emissions of less than fifteen (15) pounds per day, therefore, there are no applicable VOC requirements for this facility.
- (b) Any change or modification which may increase actual emissions from the painting department to greater than fifteen (15) pounds per day shall require prior approval from OAM before such change may occur.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the painting department shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) paint booths are in operation.

D.2.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth exhausts while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a

condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the exhaust and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) welding department consisting of six (6) metal inert gas (MIG) welding stations.
- (d) Roofing and finishing departments using cleaners, sealants, and adhesives.
- (e) Sixteen (16) 0.08 MMBtu per hour radiant tube heaters fired by natural gas.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC C-6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding department shall not exceed 0.053 pounds per hour when operating at a process weight of 3 pounds per hour. The pounds per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 6.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Volatile Organic Compounds (VOC)

- (a) The roofing and finishing departments have actual emissions of less than fifteen (15) pounds per day, therefore, there are no applicable VOC requirements for these facilities.
- (b) Any change or modification which may increase actual emissions from the roofing and finishing departments to greater than fifteen (15) pounds per day shall require prior approval for OAM before such change may occur.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Timber Wolf Trailers
Address:	13861 County Road 4
City:	Bristol, Indiana 46507
Phone #:	
MSOP #:	039-12493-00289

I hereby certify that Timber Wolf Trailers is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Timber Wolf Trailers is ☒ in compliance with the requirements of MSOP 039-12493-00289.
☐ not in compliance with the requirements of MSOP 039-12493-00289.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Timber Wolf Trailers
Bristol, Indiana
Permit Reviewer: ERG/AB

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MSOP 039-12493-00289

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. (_____) _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

PAGE 1 OF 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: Timber Wolf Trailers
Source Location: 13861 County Road 4, Bristol, Indiana 46507
County: Elkhart
SIC Code: 3799
Operation Permit No.: 039-12493-00289
Permit Reviewer: ERG/AB

The Office of Air Management (OAM) has reviewed an application from Timber Wolf Trailers relating to the construction and operation of a utility trailer manufacturing facility.

New Emission Units and Pollution Control Equipment

The source consists of the following new emission units and pollution control devices:

- (1) A plywood department consisting of the following:
 - (a) One (1) table saw, one (1) pin router, and one (1) band saw with particulate matter controlled by one (1) cyclone and one (1) baghouse (identified as C1); and
 - (b) One (1) table saw with particulate matter controlled by one (1) baghouse (identified as C2).
- (2) A painting department consisting of two (2) spray paint booths equipped with air-assisted and airless spray guns for painting steel trailer frames with primer and paint. The facility can apply undercoat at a maximum rate of 1 trailer per hour and apply paint at a maximum rate of 0.4 trailers per hour. Overspray is controlled using dry filters.
- (3) One (1) welding department consisting of six (6) metal inert gas (MIG) welding stations.
- (4) Roofing and finishing departments using cleaners, sealants, and adhesives.
- (5) Sixteen (16) 0.08 MMBtu per hour radiant tube heaters fired by natural gas.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 18, 2000, with additional information received on August 21, 2000 and September 20, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations pages 1 through 7.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	31.7
PM-10	31.7
SO ₂	0.003
VOC	6.4
CO	0.47
NO _x	0.56

HAP's	Potential To Emit (tons/year)
Triethylamine	0.24
Glycol Ethers	1.98
Managanese	0.0066
TOTAL	2.23

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10, SO₂, VOC CO, and NO_x less are equal to or greater than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a

combination HAPs is less than or equal to twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for PM, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	23.3
PM10	23.3
SO ₂	0.003
VOC	6.42
CO	0.471
NO _x	0.561
Single HAP	2.22
Combination HAPs	2.22

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit VOC and NO_x is less than ten (10) tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The painting department is not subject to the requirements 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the facility was constructed after July 1, 1990, and the facility has actual emissions of less than fifteen (15) pounds of VOC per day.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the welding, painting, and woodworking facilities shall be limited by the following:

Facility	Process Weight (lb/hour)	PM Emission Limit (lbs/hour)
Welding	3	0.053
Woodworking	160	0.75

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The cyclone and baghouse identified as C1 and the baghouse identified as C2 shall be in operation at all times the woodworking facility is in operation, in order to comply with this limit. The dry filters shall be used at all times to paint the painting facility is in operation, in order to comply with this limit.

Conclusion

The construction and operation of this utility trailer manufacturing facility shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 039-12493-00289.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Minor Source Operating permit (MSOP)

Source Name:	Timber Wolf Trailers
Source Location:	13861 County Road 4, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3799
Operation Permit No.:	MSOP 039-12493-00289
Permit Reviewer:	ERG/AB

On October 23, 2000, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Timber Wolf Trailers had applied for a Minor Source Operating Permit to operate a stationary source that produces utility trailers. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Responses to Comments From Timber Wolf Trailers

On November 17, 2000, Timber Wolf Trailers submitted comments on the proposed Minor Source Operating Permit. The following is a summary of the comments. In the responses, additions to the permit are bolded for emphasis; the language with a line through it has been deleted. The Table of Contents has been modified to reflect these changes.

1. The IDEM "Notice of 30-Day Period for Public Comment" contains an error. The last sentence of the first paragraph states: "Based on 8,760 hours of operation per year, the potential to emit particulate matter is 317 tons/year." It appears that a decimal point was omitted. The Potential To Emit table on page 2 of IDEM's Technical Support Document states that the potential to emit particulate matter is 31.7 tons/year.

Response:

The potential to emit particulate matter included in the "Notice of 30-Day Period for Public Comment" was incorrectly stated as 317 tons/year. As noted by Timber Wolf Trailers, the potential to emit particulate matter should have been entered as 31.7 tons/year as indicated in the TSD.

2. A.1 : The authorized individual should be changed to Jim Bishop. Stephanie Furman is not currently, nor has ever been an employee of Timber Wolf Trailers.

Response:

Condition A.1 of the permit will be corrected as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates source that manufacturers utility trailers.

Authorized Individual: ~~Stephanie Fuman~~ **Jim Bishop**
Source Address: 13861 County Road 4, Bristol, IN 46507
Mailing Address: P.O. Box 698, White Pigeon, MI 49099
Phone Number: (616) 483-7681
SIC Code: 3799
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD
Area Source, Section 112 of the Clean Air Act

3. A.2: It should be noted that the control equipment described in this Condition and throughout the Permit as a "baghouse" is in actuality a control equipment consisting of one filter bag.

Response:

Since IDEM routinely uses the term "baghouse" to refer to control devices consisting of one or more filter bags, IDEM concluded that the replacement of the term "baghouse" with "filter bag" was unnecessary. However, for clarification, IDEM has made the following revisions to A.2 and D.1:

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (1) A plywood department consisting of the following:
 - (a) One (1) table saw, one (1) pin router, and one (1) band saw with particulate matter controlled by one (1) cyclone and one (1) baghouse (**consisting of one (1) filter bag and** identified as C1); and
 - (b) One (1) table saw with particulate matter controlled by one (1) baghouse (**consisting of one (1) filter bag and** identified as C2).
- (2) A painting department consisting of two (2) spray paint booths equipped with air-assisted and airless spray guns for painting steel trailer frames with primer and paint. The facility can apply undercoat at a maximum rate of 1 trailer per hour and apply paint at a maximum rate of 0.4 trailers per hour. Overspray is controlled using dry filters.
- (3) One welding department consisting of six (6) metal inert gas (MIG) welding stations.
- (4) Roofing and finishing departments using cleaners, sealants, and adhesives.
- (5) Sixteen (16) 0.08 MMBtu per hour radiant tube heaters fired by natural gas.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

A plywood department consisting of the following:

- (a) One (1) table saw, one (1) pin router, and one (1) band saw with particulate matter controlled by one (1) cyclone and one (1) baghouse (**consisting of one (1) filter bag and** identified as C1); and
- (b) One (1) table saw with particulate matter controlled by one (1) baghouse (**consisting of one (1) filter bag and** identified as C2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

4. A.2: The activities listed in (3), (4), and (5) are regulatory defined “insignificant activities” and should be identified as such. In addition, due to operational needs (welding stations) and employee comfort requirements (radiant tube heaters), Timber Wolf may need to add additional units. For example, Timber Wolf now foresees a need for nine welding stations. Since the above listed units are insignificant, Timber Wolf also requests that the descriptions be changed to not include the quantity of these units.

Response:

The term “insignificant activities” applies to specific emission units located at Part 70 sources (i.e., Major Sources) and is not applicable to Minor Source Operating Permits. For Minor Source Operating Permits, all emission units, however small, are considered in determining permit level. Consequently, the descriptions of emission units provided in (3) and (4) have not been revised as requested by Timber Wolf Trailers. However, a source may undertake any modifications that are specifically exempt from permitting requirements in 326 IAC 2-1.1-3, provided the total potential emissions from the entire source after modification does not exceed the permitting thresholds for any regulated pollutant, without prior approval from IDEM or modification to their permit.

5. D.1.1: A further review of the original application has indicated that the process weight rate 160 pounds per hour was the “actual” process weight rate, and not the “maximum potential.” The maximum potential raw material (wood) being fed should be 347 pounds total for the entire plywood department. Based on this maximum potential, the condition should be changed to the following:

“Pursuant to 326 IAC 6-3 (Process Operations), the allowable emission rate from the woodworking facilities shall not exceed 1.27 pounds per hour when operating at a process weight rate of 347 pounds per hour.”

Response:

The maximum process weight of wood in Condition D.1.1 was changed to 347 pounds per hour. The potential to emit particulates stated in the TSD was not affected by this change, since the PM was calculated based on the maximum amount of PM collected by the baghouse over a specified time period. Condition D.1.1 has, therefore, been amended as follows:

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed ~~0.75~~ **1.27** pounds per hour when operating at a process weight rate of ~~460~~ 347 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

6. D.1.4(a): The control equipment is configured to exhaust indoors. Therefore, as Timber Wolf understands this condition, visible emissions notations will not be applicable unless an exhaust stack was installed that exhausts outdoors.

Response:

The permit has been amended to indicate that Condition D.1.4(a) will apply only in the event that the control equipment is exhausted outdoors.

D.1.4 Visible Emissions Notations

If the baghouse exhausts are at any time directed outdoors, the Permittee shall perform the following compliance monitoring requirements:

- (a) Daily visible emission notations of the baghouse exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
7. Both Conditions D.1.6 and D1.7 appear to describe the same situation; bag failure, and appear to be redundant. Only one of these two conditions is needed. Since the "baghouse" control equipment consists of only one bag filter, Timber Wolf requests that either (a) Condition D.1.6 be deleted and D.1.7 be included as the operating condition, or (b) Conditions D.1.6(a) and D.1.7 be deleted, and D1.7 be deleted, and D.1.6(b) be included as the operating condition.

Response:

After reviewing Conditions D.1.6 and D1.7, IDEM has concluded that Condition D.1.6 is redundant since Condition D.1.6(a) refers to baghouses with multiple units and Condition D.1.6(b) is equivalent to Condition D.1.7. Condition D.1.6 has, therefore, been deleted from the permit and Conditions D.1.7 and D.1.8 renumbered as Conditions D.1.6 and D.1.7, respectively.

8. D.1.8: As discussed above under the discussion of Condition D.1.4, the control equipment is configured to exhaust indoors. Therefore, in order to be consistent with Condition D.1.8(b), Timber Wolf requests that Condition D.1.8(a) be changed to the following:

“(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible notations of the baghouse exhausts and the dates the vents are redirected.”

Response:

To be consistent with revisions made to Condition D.1.4, IDEM has amended Condition D.1.8 as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts **and the dates the vents are redirected.**
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
9. D.3: The activities listed in (1), (2), and (3) are regulatory defined “insignificant activities and should be identified as such. In addition, due to operational needs (welding stations) and employee comfort requirements (radiant tube heaters), Timber Wolf may need to add additional units. For example, Timber Wolf now foresees a need for nine welding stations. Since the above listed units are insignificant, Timber Wolf also requests that the descriptions be changed to not include the quantity of these units.

Response:

The term “insignificant activities” applies to specific emission units located at Part 70 sources (i.e., Major Sources) and is not applicable to Minor Source Operating Permits. For Minor Source Operating Permits, all emission units, however small, are considered in determining permit level. Consequently, the descriptions of emission units provided in (3) and (4) have not been revised as requested by Timber Wolf Trailers. However, a source may undertake any modifications that are specifically exempt from permitting requirements in 326 IAC 2-1.1-3, provided the total potential emissions from the entire source after modification does not exceed the permitting thresholds for any regulated pollutant, without prior approval from IDEM or modification to their permit.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

1. Condition C.17: The requirements for semi-annual compliance monitoring do not apply to MSOP sources, therefore, this condition has been deleted from Condition C.17. This will also mean that the first sentence in Condition C.17(b) must be changed. This change has been discussed previously with the Permits Branch and the Model MSOP is being changed. The permit was modified as follows:

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- ~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (a) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- ~~(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) A malfunction as described in 326 IAC 1-6-2; or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

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**Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/2000**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Corrbar FE 100	9.3	52.00%	52.0%	0.0%	58.0%	42.00%	1.90000	1.000	0.00	0.00	0.00	0.00	0.00	19.69	47%
Gold Eagle RPR*		44.20%	0.0%	44.2%	0.0%	60.00%	0.33000	1.000			0.15	3.50	0.64	0.54	50%
Siebert Oxidermo AWE 9810	9.0	60.40%	44.0%	16.4%		33.71%	1.00000	0.400	1.47	1.47	0.59	14.14	2.58	2.99	52%

State Potential Emissions

0.73 17.64 3.22 23.22

METHODOLOGY

* Density of Gold Eagle RPR is unknown. Facility uses 0.33 lbs/unit Gold Eagle RPR.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
* Density of Gold Eagle RPR is unknown. Facility uses 0.33 lbs/unit Gold Eagle RPR.

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Appendix A: Emissions Calculations
VOC Emissions From Sealants, Adhesives, and Cleaners

Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/2000

Material	Density (Lb/Gal)	Weight % VOCs	Amount of Material Applied (lbs/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
QB-350 Latex Adhesive	11.7	1.6%	1.20000	0.02	0.46	0.08
502 Silicone Sealant	8.5	5.0%	0.52500	0.03	0.63	0.11
2320 Sealant	7.9	52.5%	0.90000	0.47	11.34	2.07
Mineral Spirits		100.0%	0.20000	0.20	4.80	0.88
Crazy Clean Cleaner	8.3	9.9%	0.07000	0.01	0.17	0.03

Maximum Potential VOC Emissions	0.72	17.40	3.17
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METHODOLOGY

Potential VOC Pounds per Hour = Pounds of Material Applied (lb/hour) * Weight % VOCs

Potential VOC Pounds per Day = Pounds of Material Applied (lb/hour) * Weight % VOCs * (24 hr/day)

Potential VOC Tons per Year = Pounds of Material Applied (lb/hour) * Weight % VOCs * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations

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HAP Emission Calculations**For Painting Department****Company Name: Timber Wolf Trailers****Address City IN Zip: Bristol, IN 46507****CP#: 039-12493-00289****Plt ID: 289****Permit Reviewer: ERG/AB****Date: 09/20/00**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Amount Used (lbs/hr)	Weight % Triethylamine	Weight % Glycol Ethers	Triethylamine Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Seibert Oxidermo AWE 9810	8.98	1.000000	0.40	3.59	1.50%	12.60%	0.24	1.98
Crazy Cleaner	8.3			0.07		4.85%		0.01

Total State Potential Emissions

0.24**2.00****METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

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**Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/00**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	6	0.5		0.0055	0.0005			0.017	0.0015	0.000	0	0.0015
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.02	0.0015			0.0015
Potential Emissions lbs/day								0.396	0.036			0.036
Potential Emissions tons/year								0.072	0.0066			0.0066

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

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Appendix A: Emissions Calculations
Particulate Matter Emissions
From Woodworking Operations

Page 5 of 7 TSD App A

Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/2000

Control Device	Control Device ID	Amount of PM Collected (lbs/hr)	Efficiency (%)	Total Potential PM Emissions (lbs/hr)	Total Potential PM Emissions (tons/yr)	Total Potential PM Emissions After Controls (tons/yr)
Baghouse and Cyclone	C1	1.25	99	1.26	5.53	0.055
Baghouse	C2	0.63	99	0.64	2.79	0.028
Total Potential PM Emissions					8.32	0.083

Methodology

Total Potential PM Emissions Before Controls (tons/year) = Amount of PM Collected (lbs/hr) * (1/.99) * (8760 hour/year)/ 2000 lbs/ton
Total Potential PM Emissions After Controls (tons/year) = Total Potential PM Emissions (tons/year) * (100 - Control Efficiency (%))

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

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Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/00

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.28

11.2

Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.043	0.043	0.003	0.561	0.031	0.471

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

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**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

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HAPs Emissions

**Company Name: Timber Wolf Trailers
Address City IN Zip: Bristol, IN 46507
CP: 039-12493-00289
Plt ID: 289
Reviewer: ERG/AB
Date: 09/20/00**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.177E-05	6.728E-06	4.205E-04	1.009E-02	1.906E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.803E-06	6.167E-06	7.849E-06	2.130E-06	1.177E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.